Attachment F
Financial Assurance (40 CFR § 144.52)
Application for Class III Underground Injection Control Permit

Florence Copper Project
Florence Copper Inc.

October 2019
Revised March 2021

HALEY ALDRICH

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Attachment F: Financial Assurance (40 CFR § 144.52)

F.1 INTRODUCTION

This Attachment conveys information describing estimated closure costs as prepared in conjunction with the pending Aquifer Protection Permit (APP) application, and costs to plug and abandon the planned in-situ copper recovery (ISCR) wells in accordance with Underground Injection Control (UIC) Permit requirements.

This Attachment has been prepared in support of an application (Application) by Florence Copper Inc. (Florence Copper) to the U.S. Environmental Protection Agency (USEPA)) for an UIC Class III (Area) Permit (UIC Permit) for the planned ISCR facility at the Florence Copper Project (FCP) in Pinal County, Arizona. With this Application, Florence Copper seeks authorization to construct and operate a commercial-scale ISCR facility at the FCP site. Florence Copper proposes to incorporate the pilot-scale Production Test Facility (PTF), which is currently operating under the UIC Permit, into the planned commercial-scale ISCR facility at the FCP site. This Attachment includes evidence of financial resources in Exhibit F-1.

F.2 DESCRIPTION OF CLOSURE COSTS

Florence Copper has prepared an estimate of closure costs in conjunction with this Application for a UIC Permit to authorize construction and operation of the planned commercial-scale ISCR facility. The closure costs for UIC regulated activities consist of closure of the ISCR wells, tank farm, septic tank, Point of Compliance (POC) wells, post-closure monitoring, and associated miscellaneous costs. A detailed description of the closure cost elements and the table of closure and post-closure cost estimates is provided below. Detailed closure cost items are included in Table F-1, and a summary of the UIC closure cost items are included in Table F-2. Information describing the basis for each of the cost estimate items are provided in the notes included with Table F-1.

F.2.1 ISCR Wells

F.2.1.1 Groundwater Restoration

Groundwater in the ISCR area will be restored to meet Aquifer Water Quality Standards (AWQS) or pre-operational concentrations if those concentrations exceed AWQS. The restoration process includes rinsing the portion of the oxide zone in which injection and recovery has occurred, injecting sodium bicarbonate or other buffering agents as needed to neutralize the groundwater, neutralizing the rinse solution with quicklime or other agents, and evaporating excess water not used for other purposes. The volume of rinse water required to adequately restore the groundwater assumes 6 percent porosity of the Bedrock Oxide Zone and nine pore volumes. Groundwater restoration is assumed to take approximately 24 months to complete for each set of wells when rinsing begins.

F.2.1.2 Abandon ISCR Wells

The approximately 500 remaining ISCR wells will be abandoned in accordance with the provisions of the APP and the Well Abandonment Plan referenced in the UIC Permit. The Well Abandonment Plan includes:

1. The removal of downhole pumps and electrical equipment. The well will then be filled from the bottom to the top of the hole with Type V Portland cement and the collar pipe will be removed to 5 feet below ground surface (bgs). The surface hole will then be backfilled and leveled at grade.
2. All pipelines, electronics, pumps, and other material will be removed off site for reuse, recycling, or landfill disposal.
3. A report will be submitted to the Arizona Department of Environmental Quality (ADEQ) and USEPA demonstrating that closure conditions required by the APP and UIC permits have been met.
4. The two Conoco shafts will be abandoned using a method similar to the well abandonments. Florence Copper plans to convert one of the Conoco shafts into a recovery well to recover ISCR solutions. The other Conoco shaft will be abandoned prior to the commencement of ISCR operations. The estimated costs to abandon the Conoco shafts are included in Exhibit F-2.

F.2.1.3 *Pipelines*

The pipelines connecting the ISCR well area to the processing and water impoundment areas will be removed. The pipelines will be flushed with groundwater and removed for off-site recycling or landfill disposal. The flushed water will be placed in the water impoundment.

F.2.1.4 *Soil and Liner Beneath Piping*

Sampling and analysis will be performed to verify that soil beneath the pipeline containment channel liner has not been impacted by leaks or spills. The liner will be removed for off-site landfill disposal. The pipeline containment channel will be backfilled and leveled out, using on-site soil. The closure cost estimate assumes no impacts to the soil beneath the liner.

F.2.1.5 Tank Farms

The tank farms consist of several aboveground storage tanks located in the ISCR and process plant areas. The tanks will be rinsed clean and moved to a storage area for future use or sold as surplus equipment. Rinse water will flow to the water impoundment. The support materials of the tanks will be checked and disposed of in accordance with applicable state and federal regulations. The liner under the tanks will be removed to an approved off-site disposal facility.

F.2.1.6 Septic Tank Closure

Septic tank closure consists of pumping out and abandoning in place, two 1,000 gallon septic tanks.

F.2.1.7 Miscellaneous Costs

F.2.1.7.1 Daily Monitoring and Observations

Permit conditions require that monitoring wells, the ponds, tank farm, and related facilities be monitored and inspected on a daily basis.

F.2.1.7.2 Quarterly Well Monitoring

The 32 POC and supplemental monitoring wells are required to be sampled on a quarterly basis and the results of the sample analyses reported. A contractor currently performs this work. The closure cost estimate assumes that this work will continue during the entire 48 months of scheduled closure activities.

F.2.1.7.3 Administrative and Miscellaneous Costs, General Project Support Costs

A general cost allowance is included for 48 months of contractor technical support and miscellaneous facility maintenance activities during the closure period. This cost is an allowance for a third party to manage the closure activities on behalf of the permittee. Maintenance activities may include minor facility maintenance such as road grading or minor repairs. Also included in this category are telephone and electrical utility charges (for office facilities), and miscellaneous office and site expenses (postage, office supplies, chemicals, etc.).

F.2.1.8 Post-Closure Monitoring

A groundwater monitoring program will be conducted at all POC and supplemental monitoring wells for 30 years during the post-closure period. Data generated from each monitoring event will be promptly reviewed and the contingency plans will be followed in the event of an exceedance of an alert level or aquifer quality limit. Monitoring for Level 1 and Level 2 parameters are scheduled to occur with the scope and frequencies specified in the APP.

During monitoring events, visual inspections will be performed on surface facilities. Areas to be monitored include signage, fences, locked gates, embankments, capped areas, and storm water control measures. Conditions noted during inspections will be documented.

F.2.1.9 POC and Supplemental Monitoring Wells

At the end of the 30-year post-closure monitoring period, the 32 POC wells and 16 supplemental monitoring wells will be abandoned in accordance with the provisions of the APP (P-101704) and UIC Permit. The well abandonment plan is designed to meet Arizona Department of Water Resources and USEPA requirements. The following provides a general description of the well abandonment procedures:

1. Removal of any downhole pumps and electrical equipment. The well will then be filled from the bottom to the top of the hole with Type V Portland cement and the collar pipe will be removed to 5 feet bgs. The surface hole will then be backfilled and leveled at grade.

2. All pipelines, electronics, pumps, and other material will be removed off site for reuse, recycling, or landfill disposal.
3. A report will be submitted to ADEQ and USEPA demonstrating that conditions established by the APP and UIC permits have been met.

Florence Copper has permitted, constructed, and begun operation of a pilot-scale ISCR facility referred to as the PTF. The PTF is operated under the terms of APP No. P-106360 and UIC Permit No. R9UIC-AZ3-FY11-1. Closure and post-closure cost estimates pertaining to the PTF have previously been submitted to ADEQ and the USEPA.

F.3 PLUGGING AND ABANDONMENT OF ISCR WELLS

Plugging and abandonment of the planned ISCR wells are incorporated into Section 1 of Table F-1 under the heading Abandon ISCR Wells. Florence Copper estimates the maximum number of ISCR wells that will be open during operations to be 462, and this is also the estimated number of wells to be closed at the end of the commercial production period. This number of wells represents the estimated plugging and abandonment burden for ISCR wells at final closure. If Florence Copper determines that more than 462 wells are required to be open during operations, financial assurance for those wells will be provided to the USEPA prior to commencement of drilling. The estimated cost to plug and abandon this number of wells is $7,506,000.

The estimated total cost of closure and post-closure activities for all the UIC regulated activities listed above is $30,793,250 (Table F-1). The list of wells to be plugged and abandoned at facility closure is included in Exhibit F-3.

F.4 EVIDENCE OF FINANCIAL RESOURCES

Exhibit F-1 is a letter dated 12 June 2019 from Stuart McDonald, Chief Financial Officer of Florence Copper, provided in response to information requirements of Attachment F of the UIC Application form. The letter demonstrates that Florence Copper is financially capable of meeting the closure and post-closure costs for all permitted ISCR facilities and associated structures as described in Table F-1 of this Application and discloses the instrument of financial assurance. A draft financial assurance instrument is included in Exhibit F-4.

TABLES

TABLE F-1

FLORENCE COPPER ISCR FACILITY CLOSURE AND POST-CLOSURE COST ESTIMATES

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

OBJECTIVES	DESCRIPTION OF TASKS	UNIT COST	PER UNIT	NO. OF UNITS	ESTIMATED COST[1]
SECTION 1. ISCR WELLS					
1. Groundwater Restoration					
Restore groundwater to meet AWQS/AQL standards, and neutralize/evaporate rinse solution. (Assumed 9 pore volumes for well rinsing, 24 month period) ISCR wells include 205 injection wells, 217 recovery wells, and 40 perimeter wells).	1.Rinse wells. [10]	$3,643,000	Project Total	1	$3,643,000
	2. Operation and maintenance labor (includes rinsing, neutralizing and evaporation for 24 month period).[17]	$1,752,000	Project Total	1	$1,752,000
	3. Quicklime Neutralization[15]	$140	Ton	46,000	$6,440,000
	4. Evaporate impoundment contents using facility evaporators.[11]	$0.27	1,000 Gallons	6,900,000	$1,863,000
	5. Sampling and monitoring during rinsing. Level 1 analysis performed quarterly during 24 month rinsing period. (Assumed system is equipped with a manifold and will require 1 sampling location per event.)[12]	$800	Sampling Event	8	$7,000
	6. Sampling, analysis, and reporting to confirm AWQS/AQLs, Level 2 analysis. (Assumed system is equipped with a manifold and will require 1 sampling location per event.)[13]	$2,000	Sampling Event	1	$2,000
	7. Includes final sampling, analysis, and reporting. Level 1 analysis performed on each well after AWQS/AQL is confirmed.[12]	$800	Well	460	$368,000
	Subtotal				**$14,075,000**
2. Abandon ISCR Wells					
Abandon 462 ISCR wells plus 20 observation wells in accordance with ADWR regulations.[7]	1. File NOIs with ADWR.	$150	Well	482	$73,000
	2. Remove electrical conduit, wellhead assemblies and control boxes.	$500	Well	472	$236,000
	3. Remove pumps.	$1,000	Well	472	$472,000
	4. Remove monuments and cement pads. Cut off casing 5 feet below land surface and backfill hole. (Two crew hours per well.)	$250	Crew Hours	964	$241,000
	5. Dispose of liners, wood, and misc. pipe in off-site landfill (5 cy/well).	$60	Cubic Yards	2,410	$145,000
	6. Type V cement ($450/cy, 0.0073 cy/ft).	$3.30	Lineal Feet	444,810	$1,468,000
	7. Tremie Type V cement from TD to 5 feet below land surface.	$5.00	Lineal Feet	444,810	$2,225,000
	8. Crew and equipment (per diem, backhoe, 10T smeal rig).	$5,000	Well	472	$2,360,000
	9. Mobilization/Demobilization.	$2,000	Project Total	1	$2,000
	10. File Abandonment Completion Reports with ADWR.	$100	Well	472	$48,000
	11. Allowance for unexpected conditions.	$500	Well	472	$236,000
	Subtotal				**$7,506,000**
3. Piping					
Clean and disposal of pipe (20,700 LF, 24-inch diameter).	1.Clean and remove pipes.[2]	$285	Crew Hour	207	$59,000
	2. Dispose of pipe in off-site landfill.[5]	$70	Ton	675	$48,000
	Subtotal				**$107,000**
4. Soil and Liner Beneath Piping					
Perform analysis to verify no impacts to soil beneath liner. (Assumed to be non-hazardous.)	1. Perform initial sampling and analysis (S&A)to verify non-hazardous.(1 sample per 50 feet of trench)[4]	$270	Sample	138	$38,000
	2. Remove liner.[5]	$0.20	Square Foot	414,000	$83,000
	3. Dispose of liner in off-site landfill.[5]	$70	Ton	62	$5,000
	4. Backfill ditch using on-site soil.[6]	$4	Cubic Yards	30,667	$123,000
	Subtotal				**$249,000**
ISCR Wells Total					**$21,937,000**

TABLE F-1
FLORENCE COPPER ISCR FACILITY CLOSURE AND POST-CLOSURE COST ESTIMATES
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

SECTION 2. TANK FARM					
1. Tank Farm					
Empty tanks of contents, rinse and decommission for re-use. Remove concrete and liner.	1. Neutralize contents of acid and sodium hydroxide tanks and place in impoundment for evaporation.	$2,000	Lump sum	1	$2,000
	2. Triple rinse tanks and dispose of rinsate in water impoundment.[14]	$285	Crew Hour	48	$14,000
	3. Relocate tanks.[14]	$285	Crew hour	32	$10,000
	4. Sample concrete.[9]	$300	Sample	20	$6,000
	5. Analyze concrete.[9]	$750	Sample	20	$15,000
	6. Demo and remove concrete liner.[8]	$8.00	Square foot	7,200	$58,000
	7. Transport and disposal concrete at off-site landfill.[3]	$70	Ton	1,000	$70,000
	8. Remove pipe and dispose in off-site landfill.[3]	$70	Ton	8	$1,000
	Subtotal				**$176,000**
2. Soil Beneath Aboveground Storage Tanks and Piping					
Characterize and appropriately dispose, as necessary.	1. Collect and analyze soil samples for characterization.[4]	$270	Sample	14	$4,000
	Subtotal				**$4,000**
Tank Farm Total					**$180,000**
SECTION 3. SEPTIC TANK CLOSURE					
1. Close septic tanks that serve the administration building and SX/EW.	Pump out (2) 1,000-gallon septic tank and close in place.	$12,000	Lump sum	1	**$12,000**
SECTION 4. MISCELLANEOUS COSTS					
1. Daily Monitoring and Observations					
Perform facility inspections and monitoring required by permit.	Included in Operation and maintenance Labor item in Section 1.				$0
2. Quarterly Well Monitoring (POC & Supplemental Wells)					
Perform quarterly monitoring of 32 POC and 16 supplemental wells (during closure).	Monitoring per Level 1 Event.	$36,000	Lump sum	8	$288,000
Total Miscellaneous Costs					**$288,000**
Closure Cost Subtotal					**$22,417,000**
Contingency (15%)					**$3,362,550**
Administrative and Miscellaneous Expenses (10%)[16]					**$2,241,700**
Closure Cost Total					**$28,021,250**
SECTION 5. POST-CLOSURE MONITORING					
1. Initial monitoring					
	1. One biennial Level 2 event.[20]	$82,500	Event	1	$83,000
	2. Seven quarterly Level 1 events.[20]	$34,500	Event	7	$242,000
	Subtotal				**$325,000**
2. Biennial monitoring					
	Fourteen biennial Level 2 events.[20]	$82,500	Event	14	**$1,155,000**
3. Maintenance					
	Maintenance of pumps and wells. Perform visual inspection of surface facilities.[19]	$43,500	Event	15	**$653,000**
4. AQL Exceedance Contingency Per UIC Permit (Part II.H.2.b)					
	1. Notify director and collect verification sample.	$7,000	Event	1	$7,000
	2. Notify director of verification results.	$600	Event	1	$1,000
	3. If verification sample indicates exceedance, submit report to ADEQ and USEPA.	$12,000	Event	1	$12,000
	Subtotal				**$20,000**
Post-Closure Monitoring Total					**$2,153,000**

TABLE F-1
FLORENCE COPPER ISCR FACILITY CLOSURE AND POST-CLOSURE COST ESTIMATES
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

SECTION 6. POC AND SUPPLEMENTAL WELLS					
Abandon 32 POC and 16 supplemental wells in accordance with ADWR and UIC regulations.[4]	1. File NOIs with ADWR.	$150	Well	48	$8,000
	2. Remove electrical conduit, wellhead assemblies and control boxes.	$500	Well	48	$24,000
	3. Remove pumps.	$600	Well	48	$29,000
	4. Remove monuments and cement pads. Cut off casing 5 feet below land surface and backfill hole. (Two crew hours per well.)[18]	$180	Crew Hours	96	$18,000
	5. Dispose of liners, wood, and misc. pipe in off-site landfill (5 cy/well).	$60	Cubic Yards	240	$15,000
	6. Type V cement ($450/cy, 0.0073 cy/ft).	$3.30	Lineal Feet	30,000	$99,000
	7. Tremie Type V cement from TD to 5 feet below land surface.	$5.00	Lineal Feet	30,000	$150,000
	8. Crew and equipment (per diem, backhoe, 10T smeal rig).	$5,000	Well	48	$240,000
	9. Mobilization/Demobilization	$2,000	Lump Sum	1	$2,000
	10. File Abandonment Completion Reports with ADWR.	$100	Well	48	$5,000
	11. Allowance for unexpected conditions.	$500	Well	48	$24,000
	12. Hydro-seed areas around the wells located in the State Mineral lease area.	$3,000	Acre	2	$5,000
POC and Supplemental Wells Total					**$619,000**
POST-CLOSURE TOTAL					**$2,772,000**
TOTAL CLOSURE AND POST-CLOSURE COST					**$30,793,250**

Abbreviations:
% = percent
ADEQ = Arizona Department of Environmental Quality
ADWR = Arizona Department of Water Resources
AQL = aquifer quality limit
AWQS = Aquifer Water Quality Standard
cy = cubic yard
cy/ft = cubic yard per foot
ISCR = in-situ copper recovery
LF = linear foot
NOI = Notice of Intent
POC = Point of Compliance
SX/EW = solvent extraction and electrowinning
UIC = Underground Injection Control
USEPA = U.S. Environmental Protection Agency

TABLE F-1 NOTES:

General Notes: *In preparing this estimate, Haley & Aldrich has relied on information and direction provided by Florence Copper and other parties and, unless otherwise expressly indicated, Haley & Aldrich has made no independent investigation as to the validity, completeness, or accuracy of such information. As with any estimate of this nature, Haley & Aldrich recommends that critical assumptions as well as the basis of estimate, be verified before proceeding with detailed project design or implementation.*

1. The values of this column have been rounded to the nearest thousand.

2. Clean and remove pipes - crew hour assumes (1 equipment operator $75/hr, 1 laborer $60/hr, 1 water pump $150/day). Crew hour includes contractor overhead and profit. Assumes crew can clean and remove 100 LF per hour.

3. Disposal of non-hazardous waste - assumes $70 per ton and includes loading, transport, and disposal. The unit cost is based on one transport vehicle making a round trip from Phoenix to Florence to Apache Junction Landfill and back to Phoenix at a cost of $350 (3.5 hrs x $100 per hr), loading cost of $200 ($10 per ton x 20 tons), and disposal cost of $800 (20 tons x $40 per ton), which totals $1,350 or ≈$70 per ton.

4. Initial Mine Block soil sampling and analysis (S&A) will be performed in areas potentially affected by spills and leaks to verify that contamination does, or does not, exist. Follow-up S&A may be required in order to determine the extent of contamination or effectiveness of remediation efforts. Costs are estimated to be less than $140 per sample for sample collection and less than $130 for sample analysis. Thus, the total S&A cost is $270 per sample.

Parameters for analysis were selected on the basis of their concentrations in solutions processed on site. Sulfate, sodium, and pH were selected because sulfuric acid and sodium hydroxide were used respectively to prepare solutions for injection and to neutralize acidic groundwater pumped from the recovery wells in the mine block to the evaporation pond. Sodium and copper were also selected as indicators of potential contamination because they are expected to have higher concentrations than other metals in the solutions pumped to and from the mine block.

Cost of sampling is estimated to be no more than $140 per sample. That would include costs for actual sample collection, for sample and sampler(s) transportation, for sample preparation, and for report preparation. Cost of analyses were estimated thusly: metals digestion, $41; pH, $22; sulfate, $25; copper, $15; and sodium, $15; for a total cost of $118 ($130 to include a 10% contingency). Thus, the total S&A cost is $270 per sample.

5. Liner Removal costs are based on recent similar projects performed by Haley & Aldrich in 2019.

6. Ponds will be filled to within 3 feet of their crests with process sediments from the facility evaporators and will be covered with 3 feet of fill. [14]

7. Well abandonment unit costs based on recent similar projects performed by Haley & Aldrich in 2019.

8. Concrete demo cost based on recent similar projects performed by Haley & Aldrich in 2019.

9. Sample and analyze concrete - sample unit costs assume not to exceed $750 per sample, analytical cost assume $270 for S&A plus $480 for sample preparation and TCLP analysis.

10. Well rinsing unit costs assume 205 injection wells, 217 recovery wells and 40 perimeter wells. Assuming a mine block of 500 feet long, 500 feet wide, and 640 feet thick; porosity of 8%; well density of 61 wells per block; and 9 pore volumes, the total volume of rinse water is 6,900,000,000 gallons. Pumps' annual operation cost is $3,942/pump; assumes 462 pumps for 2 years. Assumed on-site water source is provided.

11. Evaporation Unit Costs - assumes $0.27/1,000 gallons to evaporate. Evaporation rate of 6,600 gallons per hour and electricity cost of $1.76/hr. Purchase of evaporator not included.

12. Level 1 sampling & analysis unit costs include sampling, lab analysis, and reporting. Costs based on recent similar projects. Lab analysis costs are $59 per sample.

13. Level 2 sampling & analysis unit costs include sampling, lab analysis, and reporting. Costs based on recent similar projects. Lab analysis costs are $910 per sample.

14. Triple rinse tanks - crew hour assumes (1 equipment operator $75/hr, 1 laborer $60/hr, 1 water pump $150/day), crew hour includes contractor overhead and profit.
Assumes crew can triple rinse tanks in 6 days.

15. Quicklime Neutralization assumes 0.0133 pounds of lime per gallon of water to be neutralized, $140/ton lime unit cost.

16. Administrative support and expenses includes utilities and communications cost, miscellaneous equipment and site maintenance, and site management during closure.

17. Operation and maintenance labor crew assumes 3 day laborers $60/hr, 8 hours per day and 1 night laborer $60/hr, 16 hours a day; $2,400/day for 2 years.

18. Assumes 3 laborers at $60/hr each.

19. Operation and maintenance labor crew assumes 2, day-laborers at $60/hr, 8 hours per day ($960/day) working 10 day, with a truck, tools, and parts totaling ($19,400) to conduct inspection, operation, and maintenance of equipment.

20. Monitoring unit costs are based on recent similar projects performed by Haley & Aldrich in 2019.

TABLE F-2
FLORENCE COPPER ISCR FACILITY TOTAL CLOSURE AND POST-CLOSURE COST ESTIMATES
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

CLOSURE ACTIVITIES	ESTIMATED COST
ISCR Wells	$21,937,000
Tank Farm	$180,000
Septic Tank Closure	$12,000
Miscellaneous Costs	$288,000
Closure Cost Subtotal	$22,417,000
Contingency (15%)	$3,362,550
Administrative and Miscellaneous Expenses (10%)	$2,241,700
Closure Cost Total	$28,021,250
POST CLOSURE ACTIVITIES	
Post Closure Monitoring	$2,153,000
POC and Supplemental Wells	$619,000
Post-Closure Total	$2,772,000
TOTAL CLOSURE AND POST-CLOSURE COST	$30,793,250

EXHIBIT F-1

Florence Copper Demonstration of Financial Capability Letter
Dated 12 June 2019

FLORENCE COPPER

FLORENCE COPPER INC.
1575 W. Hunt Highway, Florence, Arizona 85132 USA
florencecopper.com

June 12, 2019

Mrs. Maribeth Greenslade
APP and Drywell Unit – Groundwater Section
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, Arizona 85007

Re: Demonstration of Financial Capability
Florence Copper Project
Significant Amendment Application
Aquifer Protection Permit No. P-101704

Dear Mrs. Greenslade:

The purpose of this letter is to demonstrate to the Arizona Department of Environmental Quality (ADEQ) the capability of Florence Copper Inc. (Florence Copper or Company) to meet the financial requirements of Arizona Administrative Code (A.A.C.) R-18-9-A203 relative to the Company's Site-Wide Individual Aquifer Protection Permit (APP) application for the Commercial Facility ("PTF") proposed to be located on land that Company owns or leases from the State of Arizona under Mineral Lease No. 11-26500.

In accordance with A.A.C. R18-9-A203(B)(1), as the Chief Financial Officer for Florence Copper Inc., I hereby state that the Company is financially capable of meeting the construction, operation, maintenance, closure, and post-closure costs identified pursuant to A.A.C. R18-9-A201(B)(5) and listed in Item 14 of the Individual APP Application Form (which accompanies Florence Copper's application for the Site-Wide Individual APP, and for which this letter is being submitted as Exhibit 4A to Attachment 4).

The Company will be submitting a performance surety bond under R18-9-A203(C)(2) as the mechanism for financial assurance for the APP and in an amount to cover all of the estimated closure and post-closure costs listed in Item 14 and described in Table 3-2 in Attachment 3 of this APP application.

The performance surety bond will meet the requirements of R18-9-A203(C)(2), which are listed below.

a. The company providing the performance bond is listed as an acceptable surety on federal bonds in Circular 570 of the U.S. Department of the Treasury;

b. The bond provides for performance of all the covered items listed in R18-9-A201(B)(5) by the surety, or by payment into a standby trust fund of an amount equal to the penal amount if the permittee fails to perform the required activities;

c. The penal amount of the bond is at least equal to the amount of the cost estimate developed in R18-9-A201(B)(5) if the bond is the only method used to satisfy the requirements of this Section or a pro-rata amount if used with another financial assurance mechanism;

d. The surety bond names the Arizona Department of Environmental Quality as beneficiary;

e. The original surety bond is submitted to the Director;

f. Under the terms of the bond, the surety is liable on the bond obligation when the permittee fails to perform as guaranteed by the bond; and

g. The surety payments under the terms of the bond are deposited directly in the Standby Trust Fund.

The Company will be submitting financial assurance using one of the approved mechanisms in R18-9-A203(C). As noted above, the Company's current intention is to submit a performance surety bond under R18-9-A203(C) as the mechanism for financial assurance for the APP, however the Company may decide to use a letter of credit or other approved mechanism as permitted under R18-9-A203(C). The Company has discussed the financial assurance requirements with several surety providers but has not yet selected the institution that will provide the performance surety bond or other approved mechanism.

FLORENCE COPPER INC.

Stuart McDonald
Chief Financial Officer

EXHIBIT F-2

Estimated Closure Costs of Conoco Shafts

EXHIBIT F-2

FLORENCE COPPER ISCR FACILITY CLOSURE AND POST-CLOSURE COST ESTIMATES

FLORENCE COPPER PROJECT

FLORENCE, ARIZONA

OBJECTIVES	DESCRIPTION OF TASKS	UNIT COST	PER UNIT	NO. OF UNITS[1]	ESTIMATED COST[1]
SECTION 1 Conoco Mine Shafts					
1. Abandon Conoco Mine Shaft No. 1 Well					
Abandon Conoco Mine shaft No. 1 well in accordance with ADWR regulations.[2]	1. File NOI with ADWR.	$150	Well	1	$150
	2. Cost of Type V Cement ($450/CY, 0.081 cy/ft)[3]	$37	Lineal Feet	841	$31,000
	3. Installation cost of (tremie) Type V cement from TD to 5 feet below land surface.	$5.00	Lineal Feet	701	$4,000
	4. Crew and equipment (per diem, backhoe, 10T smeal rig)	$10,000	Well	1	$10,000
	5. Mobilization/Demobilization	$2,000	Project Total	1	$2,000
	6. File Abandonment Completion Reports with ADWR.	$100	Well	1	$100
	7. Allowance for unexpected conditions.	$1,000	Well	1	$1,000
	Subtotal				**$49,250**
2. Abandon Conco Mine Shaft No. 2					
Abandon Conoco Mine shaft No. 2 in accordance with ADWR regulations.[2]	1. File NOI with ADWR.	$150	Well	1	$150
	2. Cost of Pea Gravel ($1,447/CY, 0.36 cy/ft)[4]	$515	Lineal Feet	45	$24,000
	3. Cost of Bentonite Seal ($6,480/CY, 0.36 cy/ft)	$2,333	Lineal Feet	10	$24,000
	4. Cost of Type V Cement ($450/CY, 0.36 cy/ft)[3]	$162	Lineal Feet	786	$128,000
	5. Installation cost of (tremie) Type V cement from TD to 5 feet below land surface.	$5.00	Lineal Feet	695	$4,000
	6. Crew and equipment (per diem, backhoe, 10T smeal rig)	$10,000	Well	1	$10,000
	7. File Abandonment Completion Reports with ADWR.	$100	Well	1	$100
	8. Allowance for unexpected conditions.	$4,000	Well	1	$4,000
	Subtotal				**$194,250**
Conoco Mine Shaft Totals					**$243,500**

Abbreviations:

ADWR = Arizona Department of Water Resources
cy = cubic yard
cy/ft = cubic yard per feet
ISCR = in-situ copper recovery
NOI = Notice of Intent

TABLE F-1 NOTES:

General Notes: *In preparing this estimate, Haley & Aldrich has relied on information and direction provided by Florence Copper and other parties and, unless otherwise expressly indicated, Haley & Aldrich has made no independent investigation as to the validity, completeness, or accuracy of such information. As with any estimate of this nature, Haley & Aldrich recommends that critical assumptions as well as the basis of estimate, be verified before proceeding with detailed project design or implementation.*

1. *The values of this column exceeding one thousand have been rounded to the nearest thousand.*
2. *Well abandonment unit costs based on recent similar projects performed by Haley & Aldrich.*
3. *Number of units accounts for estimated 20% material loss.*
4. *Number of units accounts for estimated 50% material loss to tunnel openings.*

EXHIBIT F-3

ISCR Wells to be Plugged and Abandoned at Facility Closure

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1287	847978.94	744151.46	96	16
1831	847554.55	744293.03	96	16
1832	847625.27	744293.07	96	16
1833	847625.27	744363.75	96	16
1842	847413.12	744151.60	96	16
1844	847554.54	744222.32	96	16
1845	847483.83	744222.31	96	16
1846	847835.62	744010.20	96	16
1846	847552.81	744010.19	96	16
1846	847554.53	744151.61	96	16
1846	848118.64	744010.05	113	16
1847	847764.93	744080.91	96	16
1847	847482.12	744080.90	96	16
1847	847483.83	744151.61	96	16
1847	848047.95	744080.76	113	16
1853	847625.25	744222.33	96	16
1854	847906.35	744080.93	96	16
1854	847623.54	744080.92	96	16
1854	847625.25	744151.63	96	16
1855	847837.37	744293.05	96	16
1858	847766.67	744293.05	96	16
1859	847695.97	744363.75	96	16
1862	847766.67	744363.75	96	16
1863	847695.96	744293.04	96	16
1865	847695.97	744434.45	96	16
1872	847766.65	744151.63	96	16
1873	847837.35	744151.63	96	16
1876	847766.65	744222.33	96	16
1877	847695.94	744151.62	96	16
1878	847695.95	744222.33	96	16
1880	847908.06	744222.34	96	16
1881	847837.36	744222.34	96	16
1882	847908.06	744151.64	96	16
1885	848116.79	744223.50	88	15
1160	849250.00	744363.61	98	15
1169	849179.29	744434.30	98	15
1257	848260.11	744363.62	88	15
1258	848330.82	744434.33	88	15
1259	848401.53	744505.04	88	15
1265	848330.82	744505.03	88	15
1266	848260.11	744434.32	88	15

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1267	848189.40	744363.61	88	15
1268	848189.40	744292.93	88	15
1269	848118.69	744292.92	88	15
1289	848047.97	744222.18	88	15
1290	848049.66	744151.48	96	15
1295	848542.92	744292.93	97	15
1300	848542.93	744363.64	97	15
1301	848472.22	744292.93	97	15
1302	848330.81	744292.92	97	15
1303	848401.52	744363.63	97	15
1304	848472.23	744434.34	97	15
1310	848472.22	744363.63	97	15
1311	848401.51	744292.92	97	15
1315	848401.52	744434.33	97	15
1316	848330.81	744363.62	97	15
1317	848260.10	744292.91	97	15
1321	848613.63	744292.94	97	15
1342	848542.90	744151.51	97	15
1343	848472.20	744222.21	97	15
1344	848401.49	744151.50	97	15
1345	848401.50	744222.21	97	15
1346	848332.49	744222.20	97	15
1347	848261.77	744151.49	97	15
1354	848261.79	744222.20	97	15
1355	848191.07	744222.19	97	15
1356	848191.07	744151.49	97	15
1357	848120.36	744151.48	97	15
1358	848686.02	744222.23	97	15
1359	848615.31	744222.22	97	15
1360	848544.61	744222.22	97	15
1361	848686.01	744151.52	97	15
1372	848967.15	744292.87	98	15
1373	849037.86	744363.58	98	15
1374	849108.57	744434.29	98	15
1407	849179.27	744292.89	98	15
1407	849108.56	744292.88	98	15
1408	849037.86	744292.88	98	15
1409	849108.57	744363.59	98	15
1418	848967.13	744151.45	98	15
1419	848896.43	744222.15	98	15
1420	848825.72	744151.44	98	15

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1422	849249.96	744222.18	98	15
1422	849108.55	744222.17	98	15
1423	849037.84	744222.16	98	15
1424	848967.14	744222.16	98	15
1425	849179.25	744151.47	98	15
1425	849108.54	744151.46	98	15
1432	848332.47	744151.49	97	15
1433	848615.30	744151.51	97	15
1434	848473.89	744151.50	97	15
1435	848756.71	744151.43	97	15
1436	849037.83	744151.45	98	15
1437	848896.42	744151.44	98	15
1789	847977.10	744434.47	88	15
1790	847977.11	744505.18	88	15
1791	847906.40	744434.47	88	15
1792	847835.70	744505.17	88	15
1793	847906.41	744575.88	88	15
1794	847977.11	744575.88	88	15
1795	847906.40	744505.17	88	15
1796	847906.41	744646.58	88	15
1797	847835.70	744575.87	88	15
1798	847977.12	744717.29	88	15
1799	847977.12	744646.59	88	15
1800	847977.10	744363.77	88	15
1801	848189.23	744434.50	88	15
1802	848259.94	744505.21	88	15
1803	848330.65	744575.93	88	15
1806	848259.94	744575.91	88	15
1807	848189.23	744505.20	88	15
1808	848118.52	744434.49	88	15
1809	848118.53	744505.20	88	15
1810	848189.24	744575.91	88	15
1811	848259.95	744646.63	88	15
1814	848189.24	744646.61	88	15
1815	848118.53	744575.90	88	15
1816	848047.82	744505.19	88	15
1817	848047.81	744293.10	88	15
1818	848118.52	744363.79	88	15
1819	848047.81	744363.78	88	15
1820	848047.82	744434.49	88	15
1821	848048.71	744575.02	88	15

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1822	848118.54	744646.61	88	15
1823	848047.83	744646.60	88	15
1826	848118.55	744788.03	88	15
1827	848047.84	744788.01	88	15
1828	848189.25	744717.33	88	15
1829	848118.54	744717.31	88	15
1830	848047.84	744717.31	88	15
1846	848401.45	744010.06	97	15
1846	848684.27	744009.98	106	15
1846	848967.09	744010.00	98	15
1847	848613.58	744080.69	97	15
1847	848330.76	744080.77	97	15
1847	848896.40	744080.71	98	15
1854	848472.18	744080.79	97	15
1854	848189.37	744080.78	97	15
1854	848755.00	744080.71	106	15
1854	849037.82	744080.74	98	15
1856	847906.39	744363.76	88	15
1857	847837.38	744363.76	96	15
1860	847766.68	744434.46	96	15
1861	847835.69	744434.46	88	15
1864	847764.99	744505.16	88	15
1866	847977.09	744293.06	88	15
1867	847908.08	744293.06	96	15
1879	847978.77	744222.35	96	15
1127	849674.24	744505.05	90	14
1128	849744.94	744505.05	90	14
1134	849532.83	744505.04	90	14
1135	849603.54	744575.75	90	14
1136	849674.25	744646.46	90	14
1138	849674.24	744575.75	90	14
1139	849603.53	744505.04	90	14
1144	849391.42	744505.03	90	14
1145	849462.13	744575.74	90	14
1146	849532.84	744646.45	90	14
1147	849603.55	744717.16	90	14
1149	849603.54	744646.45	90	14
1150	849532.83	744575.74	90	14
1151	849462.12	744505.03	90	14
1155	849532.84	744717.15	90	14
1156	849462.13	744646.44	90	14

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1157	849391.42	744575.73	90	14
1158	849603.52	744434.33	90	14
1158	849320.70	744434.31	90	14
1158	849886.34	744434.35	99	14
1158	849320.71	744505.02	90	14
1160	849532.82	744363.63	90	14
1160	849815.64	744363.65	99	14
1160	849250.01	744505.02	90	14
1161	849320.72	744575.73	90	14
1162	849391.43	744646.44	90	14
1163	849462.14	744717.15	90	14
1164	849532.85	744787.86	90	14
1165	849462.14	744787.85	90	14
1166	849391.43	744717.14	90	14
1167	849320.72	744646.43	90	14
1168	849250.01	744575.72	90	14
1169	849744.93	744434.34	90	14
1169	849462.11	744434.32	90	14
1169	849179.30	744505.01	90	14
1225	849744.95	744575.76	90	14
1254	848684.39	744858.60	80	14
1255	848755.11	744858.64	80	14
1260	848472.24	744575.75	80	14
1261	848542.95	744646.46	80	14
1262	848542.95	744717.16	80	14
1263	848472.24	744646.45	80	14
1264	848401.53	744575.74	80	14
1270	848684.37	744787.89	80	14
1271	848613.66	744787.87	80	14
1272	848613.66	744717.17	80	14
1296	848613.63	744363.64	89	14
1297	848684.34	744434.35	89	14
1298	848684.35	744505.06	89	14
1299	848613.64	744434.35	89	14
1305	848542.94	744505.05	89	14
1306	848613.65	744575.76	89	14
1307	848684.35	744575.76	89	14
1308	848613.64	744505.05	89	14
1309	848542.93	744434.34	89	14
1312	848613.65	744646.46	89	14
1313	848542.94	744575.75	89	14

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1314	848472.23	744505.04	89	14
1318	848684.36	744717.17	89	14
1319	848684.36	744646.47	89	14
1320	848684.33	744292.94	89	14
1322	848684.34	744363.65	89	14
1323	848755.06	744505.07	89	14
1324	848755.05	744292.99	89	14
1325	848755.05	744363.66	89	14
1326	848755.06	744434.37	89	14
1327	848755.96	744574.90	89	14
1328	848755.07	744646.49	89	14
1329	848755.09	744787.90	89	14
1330	848755.09	744717.20	89	14
1362	848755.03	744222.24	89	14
1375	849108.59	744505.00	89	14
1376	849037.87	744434.29	89	14
1377	848967.16	744363.58	89	14
1378	848896.45	744292.87	89	14
1379	848825.75	744363.57	89	14
1380	848896.46	744434.28	89	14
1381	848967.17	744504.99	89	14
1382	849037.89	744575.70	89	14
1383	849037.87	744504.99	89	14
1384	848967.16	744434.28	89	14
1385	848896.45	744363.57	89	14
1386	848825.74	744292.86	89	14
1387	848825.76	744504.98	89	14
1388	848896.47	744575.69	89	14
1390	848967.17	744575.69	89	14
1391	848896.46	744504.98	89	14
1392	848825.75	744434.27	89	14
1393	848825.77	744646.39	89	14
1394	848896.49	744717.10	89	14
1396	848896.47	744646.39	89	14
1397	848825.76	744575.68	89	14
1399	848825.77	744717.09	89	14
1400	848825.79	744787.80	89	14
1421	848825.73	744222.15	89	14
1462	848967.19	744646.40	89	14
1684	848542.98	744858.59	80	14
1685	848613.69	744929.30	80	14

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1688	848613.70	745000.01	80	14
1689	848542.99	744929.30	80	14
1690	848472.28	744858.59	80	14
1691	848330.86	744858.58	80	14
1692	848401.58	744929.29	80	14
1693	848472.29	745000.00	80	14
1694	848543.00	745070.71	80	14
1698	848542.99	745000.00	80	14
1699	848472.28	744929.29	80	14
1700	848401.56	744858.58	80	14
1701	848260.16	744929.28	80	14
1702	848330.88	744999.99	80	14
1703	848401.59	745070.70	80	14
1704	848472.30	745141.41	80	14
1708	848472.29	745070.70	80	14
1709	848401.58	744999.99	80	14
1710	848330.86	744929.28	80	14
1711	848260.15	744858.57	80	14
1714	848401.59	745141.40	80	14
1715	848330.88	745070.69	80	14
1716	848260.16	744999.98	80	14
1717	848189.45	744929.27	80	14
1723	848613.69	744858.60	80	14
1724	848684.40	744929.31	80	14
1731	848472.25	744717.17	80	14
1732	848472.25	744787.87	80	14
1733	848401.54	744717.15	80	14
1734	848401.55	744787.87	80	14
1735	848330.84	744787.85	80	14
1736	848542.96	744787.88	80	14
1787	848189.27	744858.77	80	14
1788	848118.56	744858.76	80	14
1804	848401.36	744646.64	80	14
1805	848330.65	744646.63	80	14
1812	848330.66	744717.34	80	14
1813	848259.95	744717.33	80	14
1824	848259.96	744788.04	80	14
1825	848189.25	744788.03	80	14
1099	849462.16	744858.57	81	13
1114	849391.45	744858.56	81	13
1123	849108.59	744575.70	81	13

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1170	849180.19	744574.84	81	13
1171	849250.02	744646.43	81	13
1172	849179.31	744646.42	81	13
1173	849391.44	744787.85	81	13
1174	849320.73	744787.84	81	13
1175	849320.73	744717.14	81	13
1176	849250.02	744717.13	81	13
1256	848755.11	744929.32	72	13
1273	848825.81	744929.22	72	13
1274	848896.52	744999.93	72	13
1275	848896.52	745070.63	72	13
1276	848825.81	744999.92	72	13
1363	848967.21	744858.52	81	13
1364	849037.92	744929.23	81	13
1365	848967.22	744929.23	81	13
1366	848896.51	744858.52	81	13
1367	848967.22	744999.93	81	13
1368	848896.51	744929.22	81	13
1369	848825.80	744858.51	81	13
1370	849108.62	744858.53	81	13
1371	849037.92	744858.53	81	13
1389	849037.89	744646.40	81	13
1395	848967.19	744717.10	81	13
1398	848896.49	744787.80	81	13
1401	849108.61	744787.82	81	13
1402	849037.90	744787.81	81	13
1403	848967.20	744787.81	81	13
1404	849108.60	744717.11	81	13
1405	849037.90	744717.11	81	13
1406	849108.60	744646.41	81	13
1416	849179.32	744787.83	81	13
1417	849179.32	744717.13	81	13
1486	848967.23	745070.64	72	13
1487	849037.94	745141.35	72	13
1488	849037.94	745212.05	72	13
1489	848967.23	745141.34	72	13
1491	849108.65	745212.06	72	13
1508	849108.63	744999.94	81	13
1509	849108.64	745070.65	81	13
1510	849037.93	744999.94	81	13
1511	849108.64	745141.35	81	13

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1512	849037.93	745070.64	81	13
1513	849108.63	744929.24	81	13
1514	849391.46	744929.27	81	13
1519	849320.76	744999.97	81	13
1529	849320.75	744929.26	81	13
1535	849250.05	744999.96	81	13
1536	849250.06	745070.67	81	13
1545	849179.35	745070.66	81	13
1546	849320.75	744858.59	81	13
1547	849179.34	744858.57	81	13
1548	849250.04	744858.57	81	13
1549	849250.05	744929.26	81	13
1550	849179.34	744929.25	81	13
1551	849179.35	744999.96	81	13
1552	849180.24	745140.49	81	13
1559	849250.03	744787.84	81	13
1681	848684.44	745424.25	72	13
1682	848755.16	745424.29	72	13
1683	848755.16	745494.97	72	13
1686	848684.40	745000.01	72	13
1687	848684.41	745070.72	72	13
1695	848613.71	745141.42	72	13
1696	848684.41	745141.42	72	13
1697	848613.70	745070.71	72	13
1705	848543.01	745212.12	72	13
1706	848613.71	745212.12	72	13
1707	848543.00	745141.41	72	13
1712	848543.01	745282.82	72	13
1713	848472.30	745212.11	72	13
1718	848684.43	745353.54	72	13
1719	848613.72	745353.53	72	13
1720	848684.42	745282.83	72	13
1721	848613.72	745282.83	72	13
1722	848684.42	745212.13	72	13
1725	848755.12	745070.73	72	13
1726	848755.12	745000.03	72	13
1727	848756.01	745140.56	72	13
1728	848755.13	745212.14	72	13
1729	848755.14	745353.55	72	13
1730	848755.14	745282.85	72	13
1740	848896.56	745424.18	72	13

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1741	848825.86	745494.88	72	13
1745	848825.85	745424.17	72	13
1750	848825.82	745070.63	72	13
1751	848896.53	745141.34	72	13
1752	848967.24	745212.05	72	13
1753	848825.83	745212.04	72	13
1754	848896.54	745282.75	72	13
1755	848967.24	745282.75	72	13
1756	848896.53	745212.04	72	13
1757	848825.82	745141.33	72	13
1758	848896.54	745353.45	72	13
1759	848825.83	745282.74	72	13
1760	848825.84	745353.45	72	13
1763	848967.25	745353.47	72	13
1764	849037.95	745282.77	72	13
976	850169.27	745494.98	74	12
978	850310.67	745353.58	74	12
978	850310.67	745424.28	74	12
978	850239.97	745424.28	74	12
979	850239.98	745494.99	74	12
1092	849674.27	744858.59	82	12
1093	849744.98	744929.30	82	12
1094	849815.69	745000.01	82	12
1095	849815.70	745070.72	82	12
1096	849744.99	745000.01	82	12
1097	849674.28	744929.30	82	12
1098	849603.57	744858.59	82	12
1104	849815.70	745141.42	82	12
1105	849744.99	745070.71	82	12
1106	849674.28	745000.00	82	12
1107	849603.57	744929.29	82	12
1108	849532.86	744858.57	82	12
1115	849886.38	744858.60	82	12
1115	849815.68	744858.60	82	12
1116	849744.98	744858.60	82	12
1117	849815.69	744929.31	82	12
1118	849886.41	745070.73	82	12
1119	850027.82	744929.34	82	12
1119	849957.11	744929.33	82	12
1119	849886.40	744929.32	82	12
1120	849886.41	745000.03	82	12

LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
1121	849887.31	745140.55	82	12
1122	849886.42	745212.14	74	12
1137	849744.95	744646.46	82	12
1148	849674.25	744717.16	82	12
1154	849603.55	744787.86	82	12
1177	849957.08	744787.90	82	12
1177	849815.67	744787.89	82	12
1178	849744.96	744787.87	82	12
1179	849674.26	744787.87	82	12
1180	849886.36	744717.17	82	12
1180	849815.66	744717.17	82	12
1181	849744.96	744717.17	82	12
1185	850098.56	745424.27	74	12
1186	850169.27	745424.28	74	12
1192	849957.11	745070.73	82	12
1193	850169.25	745141.46	74	12
1193	850098.53	745141.45	74	12
1193	850027.82	745141.44	74	12
1198	850027.79	745000.01	82	12
1198	849957.10	745000.02	82	12
1199	849957.12	745212.14	74	12
1200	850027.83	745282.85	74	12
1201	850098.53	745282.85	74	12
1202	850169.22	745212.14	74	12
1202	850027.82	745212.14	74	12
1203	849957.11	745141.43	74	12
1204	850027.83	745353.55	74	12
1205	849957.12	745282.84	74	12
1206	850239.96	745353.57	74	12
1207	850169.25	745353.56	74	12
1208	850098.55	745353.56	74	12
1210	850239.96	745282.87	74	12
1210	850169.25	745282.86	74	12
1226	849815.65	744575.76	82	12
1230	849815.66	744646.47	82	12
1884	850525.41	746486.71	49	11
1883	850591.17	746626.45	41	11
221	849886.56	746626.28	40	11
245	850098.66	746555.58	40	11
246	850169.37	746626.29	40	11
247	850240.08	746697.00	40	11

EXHIBIT F-4
LISTS OF WELLS TO BE PLUGGED AND ABANDONED AFTER CESSATION OF ISCR OPERATION
FLORENCE COPPER PROJECT
FLORENCE, ARIZONA

ISCR Well ID	Easting	Northing	Resource Block ID	Planned Mine Life Year of Construction
248	850098.67	746626.29	40	11
249	850027.96	746555.58	40	11
250	849957.26	746626.28	40	11
251	850098.67	746696.99	40	11
252	850027.96	746626.28	40	11
253	849957.25	746555.57	40	11
254	850522.88	746838.31	32	11
254	850240.08	746838.38	40	11
254	849957.26	746696.98	40	11
255	850240.07	746555.59	40	11
256	850169.37	746555.59	40	11
257	850240.08	746626.30	40	11
258	850593.61	746555.60	49	11
258	850522.91	746555.62	49	11
259	850452.21	746626.32	40	11
260	850381.51	746697.02	40	11
261	850452.21	746555.64	40	11
262	850310.79	746555.63	40	11
263	850381.49	746555.63	40	11
264	850381.51	746626.32	40	11
265	850310.79	746626.31	40	11

EXHIBIT F-4

Draft Financial Assurance Instrument

PERFORMANCE BOND

Date bond executed: [DATE, 2021]

Effective date: [DATE, 2021]

Principal: Florence Copper Inc.
1575 W. Hunt Highway
Florence, AZ 85132

Type of organization: Corporation

State of incorporation: Nevada

Surety: Lexon Insurance Company
10002 Shelbyville Road, Suite 100
Louisville, KY 40223

Class III In-Situ Production of Copper

EPA Permit No. R9UIC-AZ3-FY19-1

Florence Copper Project

1575 West Hunt Highway

Florence, AZ 85132

Total penal sum of bond: $30,793,250.

Surety's bond number: [DRAFT BOND#]

Know All Persons By These Presents, That We, the Principal and Surety hereto are firmly bound to the U.S. Environmental Protection Agency (hereinafter called EPA), in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors, and assigns jointly and severally; provided that, where the Sureties are corporations acting as co-sureties, we, the Sureties, bind ourselves in such sum "jointly and severally" only for the purpose of allowing a joint action or actions against any or all of us, and for all other purposes each Surety binds itself, jointly and severally with the Principal, for the payment of such sum

only as is set forth opposite the name of such Surety, but if no limit of liability is indicated, the limit of liability shall be the full amount of the penal sum.

Whereas said Principal is required, under the Underground Injection Control Regulations, as amended, to have a permit or comply with provisions to operate under rule for each injection well identified above, and

Whereas said Principal is required to provide financial assurance for plugging and abandonment as a condition of the permit or approval to operate under rule, and

Whereas said Principal shall establish a standby trust fund as is required when a surety bond is used to provide such financial assurance.

Now, Therefore, the conditions of this obligation are such that if the Principal shall faithfully perform plugging and abandonment, whenever required to do so, of each injection well for which this bond guarantees plugging and abandonment, in accordance with the plugging and abandonment plan and other requirements of the permit or provisions for operating under rule and other requirements of the permit or provisions for operating under rule as may be amended, pursuant to all applicable laws, statutes, rules and regulations, as such laws, statutes, rules, and regulations may be amended,

Or, if the Principal shall provide alternate financial assurance as specified in subpart F of 40 CFR part 144, and obtain the EPA Regional Administrator's written approval of such assurance, within 90 days after the date of notice of cancellation is received by both the Principal and the EPA Regional Administrator(s) from the Surety, then this obligation shall be null and void, otherwise it is to remain in full force and effect.

The Surety shall become liable on this bond obligation only when the Principal has failed to fulfill the conditions described above.

Upon notification by an EPA Regional Administrator that the Principal has been found in violation of the plugging and abandonment requirements of 40 CFR part 144, for an injection well which this bond guarantees performances of plugging and abandonment, the Surety shall either perform plugging and abandonment in accordance with the plugging and abandonment plan and other permit requirements or provisions for operating under rule and other requirements or place the amount for plugging and abandonment into a standby trust fund as directed by the EPA Regional Administrator.

Upon notification by an EPA Regional Administrator that the Principal has failed to provide alternate financial assurance as specified in subpart F of 40 CFR part 144, and obtain written approval of such assurance from the EPA Regional Administrator(s) during the 90 days following receipt by both the Principal and the EPA Regional Administrator(s) of a notice of cancellation of the bond, the Surety shall place funds in the amount guaranteed for the injection well(s) into the standby trust fund as directed by the EPA Regional Administrator.

The Surety hereby waive(s) notification of amendments to plugging and abandonment plans, permits, applicable laws, statutes, rules, and regulations and agrees that no such amendment shall in any way alleviate its (their) obligation on this bond.

The liability of the Surety shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of the bond, but in no event shall the obligation of the Surety hereunder exceed the amount of said penal sum.

The Surety may cancel the bond by sending notice by certified mail to the owner or operator and to the EPA Regional Administrator(s) for the Region(s) in which the injection well(s) is (are) located, provided, however, that cancellation shall not occur during the 120 days beginning on the date of receipt of the notice of cancellation by both the Principal and the EPA Regional Administrator(s), as evidenced by the return receipts.

The principal may terminate this bond by sending written notice to the Surety, provided, however, that no such notice shall become effective until the Surety receive(s) written authorization for termination of the bond by the EPA Regional Administrator(s) of the EPA Region(s) in which the bonded injection well(s) is {are) located.

In Witness Whereof, The Principal and Surety have executed this Performance Bond and have affixed their seals on the date set forth above.

The persons whose signatures appear below hereby certify that they are authorized to execute this surety bond on behalf of the Principal and Surety.

PRINCIPAL

BY: _____

Name: Bryce Hamming

Title: Chief Financial Office

Corporate Seal:

CORPORATE SURETY

Lexon Insurance Company

10002 Shelbyville Road, Suite 100

Louisville, KY 40223

State of incorporation: Texas

Liability Limit: $

By: _____

Name and Title: Theresa Pickerell, Attorney-In-Fact

Corporate Seal: